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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
THOMAS J. PARDINI IN SUPPORT
OF DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL EXHIBITS TO
THEIR TRIAL BRIEF**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal
4 knowledge and if called as a witness, I could and would competently testify to the matters set
5 forth herein. I make this declaration in support of Defendants' Administrative Motion to File
6 Under Seal Exhibits to Their Trial Brief.

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 6	Entire Document	Plaintiff
Exhibit 7	Entire Document	Defendants Plaintiff
Exhibit 8	Entire Document	Plaintiff

15 3. The entirety of Exhibit 7 contains highly confidential information regarding
16 Uber's business strategy, internal market evaluations, potential cost models, future production
17 estimates, and estimated development timelines. It also contains highly confidential information
18 regarding third-party vendors with business agreements subject to NDAs, including pricing
19 information. This information is not publicly known, and its confidentiality is strictly maintained.
20 I understand that disclosure of this information would give competitors knowledge into elements
21 of Uber's business strategy, financial estimates regarding various elements of Uber's business,
22 and confidential vendors. Uber's competitive standing could be significantly harmed.

23 4. The entireties of Exhibits 6-8 contain information that has been designated
24 "Highly Confidential – Attorneys' Eyes Only" or "Confidential" by Waymo in accordance with
25 the Patent Local Rule 2-2 Interim Model Protective Order ("Protective Order"), which the parties
26 have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this
27 material under seal in accordance with Paragraph 14.4 of the Protective Order.
28

Thomas J. Pardini

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Thomas J. Pardini has concurred in this filing.

Dated: November 21, 2017

/s/ Arturo J. González
ARTURO J. GONZÁLEZ